

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 *Attorney for Plaintiff John Waudby*

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 John Waudby,

14 Plaintiff,

15 v.

16 Trans Union, LLC et al,

17 Defendant.

Case No.: 2:22-cv-01889-RFB-DJA

**Stipulation to extend discovery
deadlines**

(First request)

18 John Waudby (“Plaintiff”) and First Premier (“Defendant”) (jointly as the
19 “parties”), by and through their respective counsel, hereby stipulate to modify the
20 Court’s Discovery Plan and Scheduling Order as follows:

- 21 1. Initial disclosures: from Mar 20, 2023, to **April 19, 2023**;
- 22 2. Amend pleadings: from Apr 19, 2023, to **May 18, 2023**;
- 23 3. Expert disclosures: from May 18, 2023, to **June 18, 2023**;
- 24 4. Rebuttal disclosures: from Jun 17, 2023, to **July 17, 2023**;
- 25 5. Discovery cutoff date: from Jul 17, 2023, to **August 16, 2023**;
- 26 6. Dispositive motions: from Aug 16, 2023, to **September 17, 2023**;
- 27 7. Pretrial order from Sep 17, 2023, to **October 17, 2023**.

1 Pursuant to LR 26-3, good cause exists to amend the Scheduling Order. The
2 Parties have diligently pursued discovery.

3 Plaintiff's claims against Experian Information Solutions, Inc. have been
4 resolved and Plaintiff filed a notice of settlement on January 25, 2023. ECF 26.

5 Plaintiff's claims against Trans Union LLC have been resolved and Plaintiff
6 filed a notice of settlement on March 8, 2023. ECF 41.

7 Plaintiff's claims against Green Dot Corporation have been resolved and
8 Plaintiff filed a notice of settlement on March 14, 2023. ECF 45.

9 On March 17, 2023, Defendant requested an extension of up to and including
10 March 31, 2023 to respond to Plaintiff's complaint. ECF 47.

11 Further good cause exists to amend the Scheduling Order to provide additional
12 time to complete settlement discussions, which are actively ongoing.

13 Pursuant to LR 26-3(b), the parties request additional time to propound
14 written discovery requests, take depositions and disclose experts.

15 Pursuant to LR 26-3(c), the reason the remaining discovery was not complete
16 within the time limits set by the discovery plan is because Defendant has not filed
17 its responsive pleading and the parties hoped to resolve the case prior to incurring
18 additional expenses.

19 ///

20 ///

21 ///

1 Pursuant to LR 26-3(d), the parties' proposed discovery schedule is listed
2 above. This is the parties' first request for an extension of these deadlines.

3
4 Dated: March 21, 2023.

5 **KIND LAW**

6
7 /s/ Michael Kind
8 Michael Kind, Esq.
8860 South Maryland Parkway, Suite 106
9 Las Vegas, Nevada 89123
10 *Counsel for Plaintiff John Waudby*

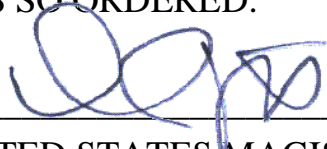
11 **BALLARD SPAHR LLP**

12 /s/ Madeleine Coles
13 Madeleine Coles, Esq.
14 Ballard Spahr
15 One Sumerlin 1980 Festival Plaza Dr #900
16 Las Vegas, Nevada 89135
Counsel for First Premier Bank

SCHEDULING ORDER

IT IS HEREBY ORDERED that the Scheduling Order is modified to extend the discovery deadlines as stated above.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: March 22, 2023